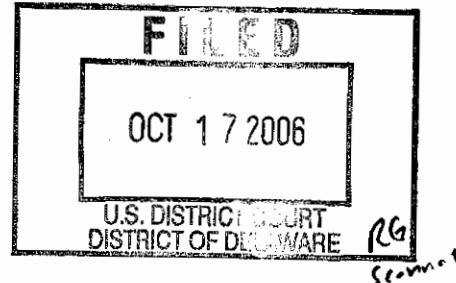


IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

STEVE HICKMAN	]	
	]	
Plaintiff,	]	C.A. No. 05-811-KAJ
	]	
SANDRA J. WHITE	]	
	]	
Plaintiff,	]	
	]	
TAWANDA WEATHERSPOON	]	
	]	
Plaintiff,	]	
	]	
vs	]	
DETECTIVE MARZEC, in his	]	
Official and Individual capacities,	]	
AGENT TOM JACOBS, and	]	
AGENT CHRIS QUAGLINO,	]	
TOWN of DELMAR, CITY OF	]	
DOVER and OFFICER MARVIN	]	
MAILEY	]	
	]	
Defendants,	]	



AMENDED COMPLAINT OF SANDRA WHITE, TAWANDA  
WEATHERSPOON & STEVE HICKMAN

NOW COMES the plaintiffs, Sandra J. White, Tawanda Weatherspoon and Steve Hickman, pro se, who so moves the Honorable Court to amend the Complaint, in the aforementioned matter, in support of the same the following is submitted:

[1]. Officer marvin Mailey is employed as a police officer for The City of Dover.

[2]. It is the custom and practice of the City of Dover, that allowed Officer Marvin Mailey to work undercover for D.E.A. (Drug Enforcement Agency) that allowed him to violate the civil rights of Sandra J. White, Tawanda Weatherspoon and Steve Hickman on 09-21-05.

a. He participated and violated their rights against illegal search and seizure knowing and willfully along with Detective Marzec, Agent

page Hickman vs Marzec, et al., C.A. No. 05-811-KAJ

Tom Jacobs and Agent Chris Quaglino, did utilize a search warrant for a residence in Ellendale Delaware to raid a home in Lincoln Delaware.

b. This is after an intense and well documented investigation, that involved numerous trips and surveillance describing Ellendale and Lincoln Delaware in great detail, then they submit affidavits to the Court stating they didn't know the difference. *Springfield v. Kibble* 480 U.S. 257

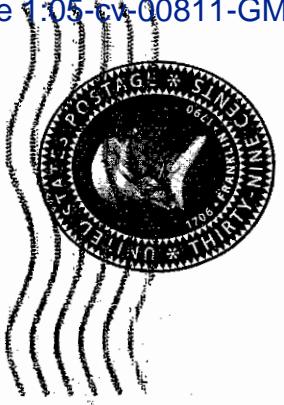
[3]. The City of Dover is responsible for the training and supervision Of Officer Marvin Mailey and failed to properly meet its obligation and the Plaintiffs have suffered directly because of the City of Dover's actions and Inactions and pursuant to 42 U.S.C. subsection 1983 Officer Marvin Mailey And City of Dover are liable to plaintiffs as well as Detective Marzec, Town Of Delmar, Agent Tom Jacobs and Agent Chris Quaglino. *Monell v. New City Dept., of Social Servs* 436 U.S. 658

[4]. Because of the way they willfully and knowing violated a known Civil rights of the plaintiff, they are not eligible for qualified immunity and discovery will show and expose their misdeeds and acts and show the depths of their violations of the civil rights of the plaintiff and they are not entitled to relief via Motion to Dismiss and it should be denied as a matter of law. *Pembaur v. Cincinnati*, 475 U.S. 469

Tawanda Weatherspoon Sandra J. White Steve Hickman  
Tawanda Weatherspoon Sandra J. White Steve Hickman

October 13, 2006

Service of the attached Document, will be done via U.S. Postal system, on this 13<sup>th</sup> day of October 2006, and will be served upon Mr Seth M. Beausang, Esq., at 1007 Orange St Suite 700, Wilmington, DE. 19801 and Mr. Daniel A. Griffith, Esq., at 1220 Market St. 5<sup>th</sup> Floor, Wilmington, DE. 19801 and our signatures verify the same.



WILMINGTON DE 197  
16 OCT 2006 PM 3:17

Samuel J. Ulrich  
Good Shepherd  
Parish, DE 19960

U.S. MAIL  
S.S.M.

Clerk  
U.S. District Court  
Rockford 18  
844 King St  
Wilmington DE  
19801-3513 2012